

EXHIBIT B

From: [Santacana, Eduardo E.](#)
To: [Alex Frawley; FIREBASE-WFGE](#)
Cc: ["GOOGLETEAM@lists.susmangodfrey.com"](#)
Subject: RE: Rodriguez v. Google
Date: Tuesday, August 24, 2021 1:41:00 AM

EXTERNAL Email

Alex,

We are preparing to make two more sizable document productions from the three custodians the parties have agreed on in this case over the next four weeks or so. These productions will include a lot more documents in light of the parties' discussions on other relevant areas in the case and other types of search terms Google should consider using. I think it makes the most sense for Plaintiffs to evaluate those productions first, so we can have a productive discussion about what is truly unique and non-duplicative.

As for AdMob and Cloud Messaging, we are evaluating Judge Seeborg's ruling with our client and will write under separate cover concerning our view. For now, we will begin producing non-custodial documents that are relevant and responsive.

Thanks,
Eduardo

Eduardo E. Santacana
Willkie Farr & Gallagher LLP
One Front Street | San Francisco, CA 94111
Direct: [+1 415 858 7421](tel:+14158587421) | Fax: +1 415 858 7599
esantacana@willkie.com | [vCard](#) | www.willkie.com/bio

From: Alex Frawley <AFrawley@susmangodfrey.com>
Sent: Monday, August 23, 2021 12:02 PM
To: FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>
Cc: 'GOOGLETEAM@lists.susmangodfrey.com' <GOOGLETEAM@lists.susmangodfrey.com>
Subject: RE: Rodriguez v. Google

*** EXTERNAL EMAIL ***

Counsel,

We have not yet heard back from you about our request for additional custodians in this letter. Please let us know when you are available for a meet and confer on Wednesday or Thursday. In addition, in light of Chief Judge Seeborg's ruling last week, can you please let us know which new custodians you will propose to cover the Cloud Messaging and AdMob portions of the case?

Best,
Alex

Alexander P. Frawley

917.599.6613 (cell)

From: owner-googleteam@lists.susmangodfrey.com <owner-googleteam@lists.susmangodfrey.com> **On Behalf Of** Alex Frawley
Sent: Wednesday, August 11, 2021 9:34 PM
To: Hur, Benedict Y. <BHur@willkie.com>; Agnolucci, Simona <SAgnolucci@willkie.com>; Santacana, Eduardo E. <ESantacana@willkie.com>; Arakaki, Lori <LArakaki@willkie.com>
Cc: GOOGLETEAM@lists.susmangodfrey.com; FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>
Subject: Rodriguez v. Google

EXTERNAL Email

Counsel,

Please see the attached letter.

Best,
Alex

Alexander P. Frawley | Susman Godfrey LLP

1301 Avenue of the Americas, 32nd Floor | New York, NY 10019

212.729.2044 (office) | 917.599.6613 (cell)

afrawley@susmangodfrey.com | www.susmangodfrey.com

This e-mail contains communication that may constitute attorney/client privileged information and/or attorney work product. If you received this message in error, please notify the sender and delete it immediately.

To unsubscribe from the GOOGLETEAM list, [click here](#)

Important Notice: This email message is intended to be received only by persons entitled to receive the confidential information it may contain. Email messages to clients of Willkie Farr & Gallagher LLP presumptively contain information that is confidential and legally privileged; email messages to non-clients are normally confidential and may also be legally privileged. Please do not read, copy, forward or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it back. Willkie Farr & Gallagher LLP is a limited liability partnership organized in the United States under the laws of the State of Delaware, which laws limit the personal liability of partners.